



**COUNT ONE:** (Title 21, United States Code, Section 846 – Conspiracy to Possess With Intent to Distribute and to Distribute Heroin, Cocaine and Fentanyl)

The Grand Jury charges that:

From a date unknown, but not later than in or about January 2017, and continuing up to and including the date of the filing of this indictment, at Lawrence, and elsewhere in the District of Massachusetts, in the District of New Hampshire, and elsewhere,

1. **RAMON GONZALEZ NIVAL, A/K/A SANTO RAMON GONZALEZ NIVAR, A/K/A SANTO MARINO GONZALEZ-NIVAL, A/K/A SANTO MARINO GUERRERO RUIZ, A/K/A LUIS RIVERA, A/K/A RICHARD ROMERO, A/K/A ISMAEL RIVERA-AYALA, A/K/A CABALLITO, A/K/A RAMONCITO, A/K/A CABALLO;**
2. **ROBERT FRETT SIERRA, A/K/A JOSE ROSADO SANCHEZ, A/K/A CHIQUITO, A/K/A PEQUENO, A/K/A LUIS D. RESTO, A/K/A TIMOTHY O'LEARY, A/K/A LUIS VEGA MARTINEZ;**
3. **JULIO BAEZ GONZALEZ, A/K/A MANOLO;**
4. **RUDDY RAFAEL SOTO LARA, A/K/A FLOR SAEZ GUZMAN, A/K/A YERNAN FREIGHT, A/K/A RAFAEL RUDDY, A/K/A MANUEL GONZALEZ, A/K/A FLOR SAEZ, A/K/A JORGE NAVAREZ, A/K/A PEJE;**
5. **GERONIMO CONFESOR GONZALEZ NIVAR, A/K/A GERONIMO GONZALEZ-NIVAL, A/K/A GERONIMO RUIZ-GONZALEZ; ALEXIE, A/K/A JABOA;**
6. **CARLOS HERNANDEZ, A/K/A GORDO**
7. **RORY CONNOLLY;**
8. **BERNALDO ROSARIO SANTIAGO, A/K/A BORI;**
9. **DIOSMARY BURGOS; and**
10. **SANTOS RUIZ NIVAR, A/K/A TIO;**

defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute controlled substances, to wit: heroin, a Schedule I controlled substance; and cocaine and fentanyl, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO:      18 U.S.C. § 922(g)(5)(A) – Alien Unlawfully Present in United States  
in Possession of a Firearm and Ammunition**

The Grand Jury charges that:

On or about September 7, 2016, at Lawrence, in the District of Massachusetts,

**5.      GERONIMO CONFESOR GONZALEZ NIVAR, A/K/A  
GERONIMO GONZALEZ-NIVAL, A/K/A GERONIMO RUIZ-  
GONZALEZ, A/K/A ALEXIE, A/K/A JABOA,**

defendant herein, being an alien unlawfully present in the United States, did knowingly possess in and affecting commerce a firearm and ammunition, to wit: a Beretta, Model 950 BS.22 Short Pistol and six rounds of .22 caliber ammunition.

All in violation of Title 18, United States Code, Section 922(g)(5)(A).

**COUNT THREE: 8 U.S.C. § 1326—Unlawful Re-entry of Deported Alien**

The Grand Jury charges that:

On or about April 13, 2017, at or near Lawrence, in the District of Massachusetts,

- 4. RUDDY RAFAEL SOTO LARA, A/K/A FLOR SAEZ GUZMAN, A/K/A YERNAN FREIGHT, A/K/A RAFAEL RUDDY, A/K/A MANUEL GONZALEZ, A/K/A FLOR SAEZ, A/K/A JORGE NAVAREZ, A/K/A PEJE,**

defendant herein, being an alien and having been excluded, deported and removed from the United States on or about December 3, 2013, was found in the United States without having received the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States.

All in violation of Title 8, United States Code, Sections 1326(a)(1) and Title 6, United States Code, Section 202(3) and (4), and Section 557.

**COUNT FOUR: 8 U.S.C. § 1326--Unlawful Re-entry of Deported Alien**

The Grand Jury charges that:

On or about May 30, 2017, at or near Lawrence, in the District of Massachusetts,

1. **RAMON GONZALEZ NIVAL, A/K/A SANTO RAMON GONZALEZ NIVAR, A/K/A SANTO MARINO GONZALEZ-NIVAL, A/K/A SANTO MARINO GUERRERO RUIZ, A/K/A LUIS RIVERA, A/K/A RICHARD ROMERO, A/K/A ISMAEL RIVERA-AYALA, A/K/A CABALLITO, A/K/A RAMONCITO, A/K/A CABALLO;**

defendant herein, being an alien and having been excluded, deported and removed from the United States on or about May 19, 2009, was found in the United States without having received the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States.

All in violation of Title 8, United States Code, Sections 1326(a)(1) and Title 6, United States Code, Section 202(3) and (4), and Section 557.

**COUNT FIVE:      8 U.S.C. § 1326--Unlawful Re-entry of Deported Alien**

The Grand Jury charges that:

On or about May 30, 2017, at or near Lawrence, in the District of Massachusetts,

- 2.      ROBERT FRETT SIERRA, A/K/A JOSE ROSADO SANCHEZ,  
A/K/A CHIQUITO, AK/A PEQUENO,  
A/K/A LUIS D. RESTO, A/K/A TIMOTHY O'LEARY, A/K/A  
LUIS VEGA MARTINEZ;**

defendant herein, being an alien and having been excluded, deported and removed from the United States on or about August 6, 2006, was found in the United States without having received the express consent of the Secretary of the Department of Homeland Security to reapply for admission to the United States.

All in violation of Title 8, United States Code, Sections 1326(a)(1) and Title 6, United States Code, Section 202(3) and (4), and Section 557.

**COUNT SIX:        18 U.S.C. § 922(g)(5)(A) – Alien Unlawfully Present in United States  
in Possession of a Firearm and Ammunition**

The Grand Jury charges that:

On or about May 30, 2017, at Lawrence, in the District of Massachusetts,

**3.        JULIO BAEZ GONZALEZ, A/K/A MANOLO;**

defendant herein, being an alien unlawfully present in the United States, did knowingly possess in and affecting commerce a firearm and ammunition, to wit: a L.W. Seecamp, Model LWS380, 380 Caliber Pistol, Serial Number L3S553, and a Smith & Wesson, Model SD9VE, 9mm Caliber Pistol, Serial Number FXJ5864, and ten rounds of 9mm ammunition.

All in violation of Title 18, United States Code, Section 922(g)(5)(A).



**CRIMINAL FORFEITURE ALLEGATIONS:**  
**18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)**

The Grand Jury further alleges that:

1. Upon conviction of the offense charged in Count Two of this Indictment, the defendant,

5. **GERONIMO CONFESOR GONZALEZ NIVAR, A/K/A  
GERONIMO GONZALEZ-NIVAL, A/K/A GERONIMO RUIZ-  
GONZALEZ, A/K/A ALEXIE, A/K/A JABOA,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in the commission of the offense, including and not limited to: a Beretta, Model 950 BS .22 Short Pistol and six rounds of .22 caliber ammunition.

2. If any of the forfeitable property described in paragraph 1 above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

**CRIMINAL FORFEITURE ALLEGATIONS:**  
**18 U.S.C. § 924(d) & 28 U.S.C. § 2461(c)**

The Grand Jury further alleges that:

1. Upon conviction of the offense charged in Count Two of this Indictment, the defendant,

3. **JULIO BAEZ GONZALEZ, A/K/A MANOLO,**  
shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in the commission of the offense, including and not limited to: a L.W. Seecamp, Model LWS380, 380 Caliber Pistol, Serial Number L3S553, and a Smith & Wesson, Model SD9VE, 9mm Caliber Pistol, Serial Number FXJ5864, and ten rounds of 9mm ammunition.

2. If any of the forfeitable property described in paragraph 1 above, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above property described in paragraph 1 above.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

**DRUG FORFEITURE ALLEGATION**  
**(21 U.S.C. § 853)**

The Grand Jury further alleges that:

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count One of this Indictment,

1. **RAMON GONZALEZ NIVAL, A/K/A SANTO RAMON GONZALEZ NIVAR, A/K/A SANTO MARINO GONZALEZ-NIVAL, A/K/A SANTO MARINO GUERRERO RUIZ, A/K/A LUIS RIVERA, A/K/A RICHARD ROMERO, A/K/A ISMAEL RIVERA-AYALA, A/K/A CABALLITO, A/K/A RAMONCITO, A/K/A CABALLO;**
2. **ROBERT FRETT SIERRA, A/K/A JOSE ROSADO SANCHEZ, A/K/A CHIQUITO, AK/A PEQUENO, A/K/A LUIS D. RESTO, A/K/A TIMOTHY O'LEARY, A/K/A LUIS VEGA MARTINEZ;**
3. **JULIO BAEZ GONZALEZ, A/K/A MANOLO;**
4. **RUDDY RAFAEL SOTO LARA, A/K/A FLOR SAEZ GUZMAN, A/K/A YERNAN FREIGHT, A/K/A RAFAEL RUDDY, A/K/A MANUEL GONZALEZ, A/K/A FLOR SAEZ, A/K/A JORGE NAVAREZ, A/K/A PEJE,**
5. **GERONIMO CONFESOR GONZALEZ NIVAR, A/K/A GERONIMO GONZALEZ-NIVAL, A/K/A GERONIMO RUIZ-GONZALEZ, A/K/A ALEXIE, A/K/A JABOA; A/K/A ALEXIE,**
6. **CARLOS HERNANDEZ, A/K/A GORDO**
7. **RORY CONNOLLY;**
8. **BERNALDO ROSARIO SANTIAGO, A/K/A BORI;**
9. **DIOSMARY BURGOS; and**
10. **SANTOS RUIZ NIVAR, A/K/A TIO**

defendants herein, shall forfeit to the United States, jointly and severally, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds

obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant --

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;


it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL



FOREPERSON OF THE GRAND JURY

  
SUSAN G. WINKLER  
ASSISTANT U.S. ATTORNEY  
DISTRICT OF MASSACHUSETTS  
DATED: June 14, 2017

Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK

6-14-17

10:49 a.m.